

Our policies

Supplier Code of Conduct Policy

Pointer Ltd

Introduction

At Pointer, we are committed to conducting business in an ethical, legal, and socially responsible manner. We expect our suppliers to share this commitment and adhere to similar standards. This includes supporting Pointer in maintaining a workplace that is safe, respectful and free from bullying, harassment and sexual harassment, in line with current and forthcoming UK employment legislation.

This Supplier Code of Conduct outlines the principles and expectations we uphold for our suppliers in the areas of business integrity, labour practices, health and safety, environmental management, information security, business continuity and legal compliance.

Compliance with Laws and Regulations

Suppliers must comply with all applicable laws, rules, and regulations in the countries where they operate.

Business Integrity and Ethics

Suppliers are expected to conduct their business activities with integrity and ethical behaviour, including but not limited to:

- Prohibition of corruption, extortion, embezzlement, and bribery.
- Transparency in business dealings.
- Respect for intellectual property rights.

Labour Practices and Human Rights

Suppliers must uphold the human rights of their employees and treat them with dignity and respect. This includes:

- Prohibition of child labour and forced labour.
- Non-discrimination and equal opportunity employment practices.
- Fair compensation and compliance with minimum wage laws.
- Reasonable working hours and humane working conditions.
- Freedom of association and the right to collective bargaining.

Respect at Work, Harassment and Sexual Harassment

Suppliers must promote a working environment where everyone is treated with dignity and respect and where unacceptable behaviour is not tolerated.

Suppliers are expected to:

- Take all reasonable steps to prevent bullying, harassment, sexual harassment and victimisation within their organisation and while carrying out work on behalf of Pointer.
- Ensure their employees, agency workers and subcontractors behave professionally and respectfully towards Pointer colleagues, customers, contractors and members of the public.
- Maintain appropriate policies, reporting procedures and training to prevent harassment and promote a respectful working environment.

- Investigate allegations of inappropriate behaviour promptly and take appropriate action where misconduct is identified.
- Co-operate fully with Pointer in relation to any investigation involving their personnel.
- Ensure no worker suffers retaliation for raising concerns or reporting inappropriate behaviour.

Health and Safety

Suppliers must provide a safe and healthy working environment to prevent accidents and injury to health. This includes:

- Compliance with all applicable safety laws.
- Implementation of workplace safety practices and training.
- Providing necessary personal protective equipment.

Environmental Management

Suppliers are expected to conduct operations in a way that minimizes the impact on the environment. This includes:

- Compliance with environmental regulations.
- Implementation of environmentally responsible practices in production and waste management.
- Promotion of sustainable resource usage.

Building Safety & Regulatory Compliance

Suppliers must ensure compliance with all applicable UK building safety legislation, including but not limited to the Building Safety Act 2022 and the Building Regulations 2010 (as amended).

Suppliers are expected to:

- Where applicable, fulfil the roles and responsibilities of duty holders as defined under the Building Regulations, including acting competently in roles such as Designer, Contractor, or Principal Designer/Contractor.
- Ensure that all individuals carrying out design, construction, or installation work are:
 - Competent for their role
 - Appropriately trained, qualified, and experienced
 - Working within the limits of their competence
- Golden Thread of Information maintain accurate, up-to-date, and accessible records of building and safety information, ensuring that:
 - Information is properly managed throughout the lifecycle of a project
 - Records can be shared with Pointer upon request
- Ensure all works:
 - Meet applicable Building Regulations requirements
 - Follow approved designs and specifications
 - Are properly inspected, verified, and signed off
- Implement robust processes for managing and approving any design or construction changes that may impact compliance or safety.

Information Security

Suppliers to collect, process, store and destroy information in line with relevant legal, regulatory, and industry standards (e.g., GDPR . Data Protection Act).

The supplier is also expected to:

- Implement measures to protect data from unauthorised alteration or tampering during transit and storage.
- Assess and manage security risks associated with third-party vendors and partners.
- Incident Response: Inform Pointer of any data breaches or other information incidents as soon as possible.

Business Continuity

Suppliers are expected to identify and assess potential risks and vulnerabilities that could disrupt supply chain operations. We expect our supplier to implement procedures for maintaining operations during disruptions.

Monitoring and Compliance

Pointer reserves the right to verify compliance with this Code of Conduct through audits and assessments.

Suppliers are expected to maintain documentation to demonstrate their compliance.

This may include evidence of policies, training, risk assessments or procedures relating to equality, dignity at work, bullying and harassment, including sexual harassment, where relevant to the services being provided.

Reporting Violations

Suppliers must promptly report any actual or suspected breaches of this Code of Conduct, including incidents involving discrimination, bullying, harassment, sexual harassment, safeguarding concerns or other inappropriate conduct affecting Pointer colleagues, customers or other persons while undertaking work on Pointer's behalf.

Pointer will investigate such reports and take appropriate action.

Continuous Improvement

Suppliers are encouraged to continually improve their performance in line with this Code of Conduct.

The sub-contractor's insurance and other third party certifications must be revalidated every 12 months throughout the duration of their contract with Pointer and sent to Pointer.

Conclusion

Adherence to this Supplier Code of Conduct is expected from all of our suppliers as a condition of doing business with Pointer. We are committed to working collaboratively with our suppliers to uphold these principles and practices.

Review and Update

- This policy will be reviewed annually to ensure it remains relevant and effective.
- Updates will be made to reflect changes in our business needs, technological changes and industry trends.

Approval

This policy has been approved by the highest level of management at Pointer, reflecting our commitment to the ongoing development of our colleagues.